

**APPENDIX F**

**DISCOVERY PLAN WORKSHEET**

**Tier I Pre-Settlement Discovery**

Deadline for completion of Rule 26(a) initial disclosures and HIPAA-complaint records authorizations:	<u>5/28/2019</u>
Completion date for Phase I Discovery as agreed upon by the parties: <i>(Reciprocal and agreed upon document production, generally not including depositions, unless otherwise agreed. No more than 30 days after Initial Conference)</i>	<u>6/12/2019</u>
Status conference TBD by the court: <i>(Generally 15 days post Tier I Discovery)</i>	<u>6/27/2019</u>

**Tier II Discovery and Motion Practice**

Motion to join new parties or amend the pleadings: <i>(Presumptively 15 days post status conference)</i>	<u>7/12/2019</u>
First requests for production of documents and for interrogatories due by: <i>(Presumptively 15 days post joining/amending )</i>	<u>7/28/2019</u>
All fact discovery completed by: <i>(Presumptively 3.5 months post first requests for documents/interrogatories )</i>	<u>11/12/2019</u>
Exchange of expert reports completed by: <i>(Presumptively 30 days post fact discovery)</i>	<u>12/12/2019</u>
Expert depositions completed by: <i>(Presumptively 30 days post expert reports)</i>	<u>1/3/2020</u>
Final date to take first step in dispositive motion practice: <i>(Parties are directed to consult the District Judge's individual rules regarding such motion practice. Presumptively 30 days post expert depositions)</i>	<u>2/12/2020</u>

**COMPLETION OF ALL DISCOVERY BY:**

*(Note: Presumptively 9 months after Initial Conference.)*

Submission of joint pre-trial order:

Final Pre-Trial Conference TBD by the court: